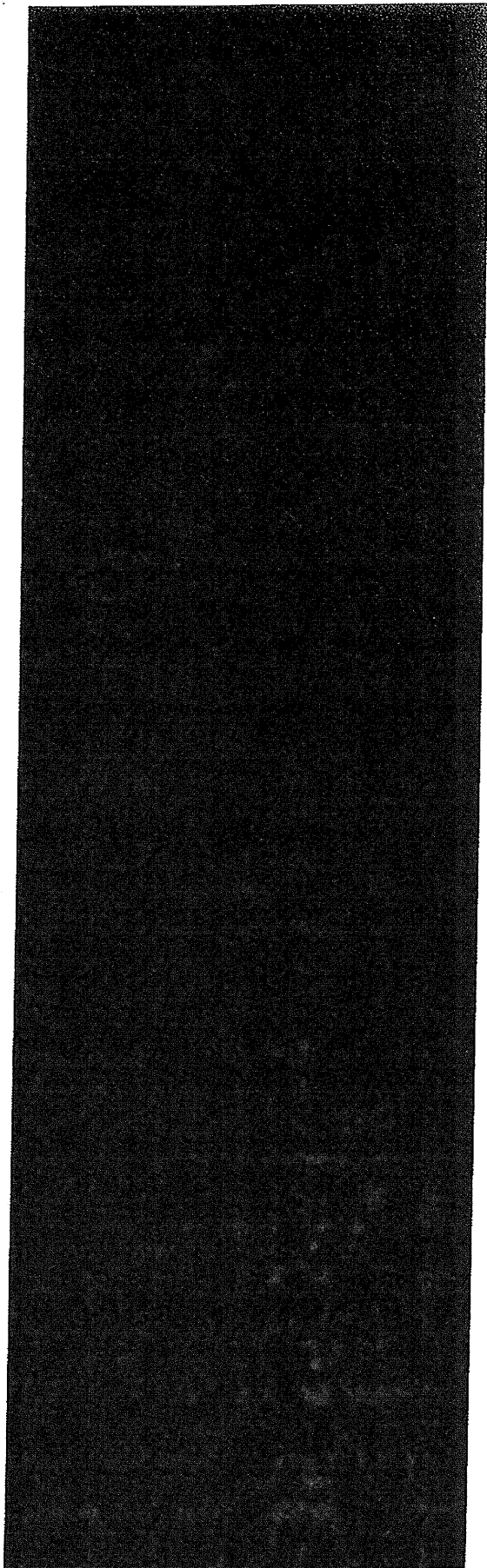


Exhibit I

BUCHANAN V. GM

JANUARY 27, 2020



RELEVANCE OF MARY BARRA'S TESTIMONY

Continuing Duty to Warn

A manufacturer's duty to warn is a continuing one and may arise 'months, years or even decades after the date of the first sale of the product. The manufacturer's duty to warn may be "based on knowledge acquired after the product is sold."

Georgia Suggested Pattern Jury Instructions, Vol. I: Civil Cases, 5th ed. (2018), Charge 62.683; *Chrysler Corp. v. Batten*, 264 Ga. 723 (1994).